

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
2005 DEC 16 10 43 AM

Bienvenido I. Lugo-Marchant

Plaintiff,

v.

**Peter Tsickritzis, Kevin Kingston,
and United Liquors Limited et al.,**

Defendants

Civil Action No. 05 11317 NMG
U.S. DISTRICT COURT
DISTRICT OF MASS.

JOINT STATEMENT

NOW COME the parties in the above-entitled action and submit their Joint Statement pursuant to Rule 16.1 of the Local Rules for the United States District for the District of Massachusetts. The parties propose the following schedules with the first date as the most feasible although the second and third remaining dates can be selected as options should there be any conflict. The parties propose the following schedules;

Proposed Pretrial Schedule and Discovery Plan

January 23 (or 24, or 25), 2006	Plaintiff and Defendants to disclose their experts and experts reports
February 21 (or 22, or 23), 2006	Deadline for completion of all fact and expert discovery, including requests for production of documents, interrogatories and witness depositions
April 17 (or 18, or 19), 2006	Deadline for filing dispositive motions, if either party determines that such a motion is appropriate
May 22 (or 23, or 24), 2006	Deadline for filing oppositions to dispositive motions
June 26 (or 26, or 28), 2006	Deadline for filing reply to oppositions to dispositive motions

Plaintiff and Defendants understand and agree that their respective discovery schedules assume the cooperation of Plaintiff, defendants, all third parties witnesses, and expert witnesses. Plaintiff and Defendants further agree that requests for additional time for discovery may be made

and should be reasonably agrees to in the event of delays occasioned by discovery disputes requiring a decision by the Court, and the unavailability of fact or expert witnesses due to vacation or work schedules.

I would also offer the following dates (and any day of that week) as an option for the schedule and discovery plan at the same order: Feb.13, March 13, May 15, June 15 and July 17. I believe the dates suggested by the Defendants are too long. I also would like to see if there is any alternate dispute resolution available.

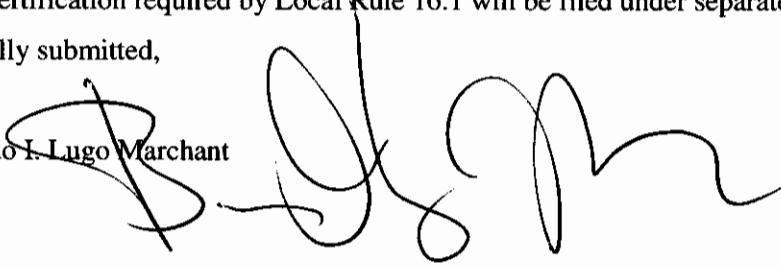
Certification

Plaintiff certification required by Local Rule 16.1 will be filed under separate cover.

Respectfully submitted,

Bienvenido I. Lugo Marchant

Pro se

A handwritten signature in black ink, appearing to be 'B. Lugo Marchant', written over a light gray background.

Bienvenido I. Lugo-Marchant

19 Grove Street

Brockton, MA 02301

Copy to United Liquors Limited, Peter Tsickritzis and Kevin Kingston

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Heather Stepler, Esq.

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